

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE PROPERTY AND CASUALTY)	
INITIATIVE, LLC,)	
)	
Plaintiff,)	C.A. No.: 05-10520-RCL
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
acting through the National Credit)	
Union Administration,)	
)	
Defendant.)	
)	

**DEFENDANT'S ASSENTED -TO MOTION FOR EXTENSION OF
TIME IN WHICH TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Now comes the defendant, United States of America,¹ and hereby moves this Court for an extension of time **up to and including August 31, 2005**, to answer or otherwise respond to the Complaint. As reasons therefore, the undersigned counsel for the United States asserts that the parties continue to engage in discussions concerning the case, in the hopes of narrowing and/or resolving the issues presented in this matter.

The United States asserts that counsel for the plaintiff has assented to this motion.

¹ This motion is not intended to be a responsive pleading. By the filing of this motion, the United States is not waiving any of the procedural, affirmative, or other waivable and non-waivable defenses available to it in the normal course of filing a responsive pleading. The United States intends to raise those defenses when it answers or otherwise responds to the Complaint.

WHEREFORE, the United States respectfully requests that this Court allows its motion for an extension of time **up to and including August 31, 2005**, to answer or otherwise respond to the Complaint.

Respectfully submitted,

UNITED STATES OF AMERICA,
By its attorney,

MICHAEL J. SULLIVAN
United States Attorney

Dated: August 1, 2005

By: /s/Gina Walcott-Torres
Gina Walcott-Torres
Assistant U.S. Attorney
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LOCAL RULE 7.1(A)(2) CERTIFICATION

The undersigned counsel certifies that she conferred with counsel for plaintiff and that he assented to the relief sought herein.

/s/Gina Walcott-Torres
Gina Walcott-Torres
Assistant U.S. Attorney